IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF SOUTH CAROLINA FLORENCE DIVISION

) CR. NO.: 4:22:cr-580
)
)
) MOTION FOR EXTENSION
) OF TIME TO RESPOND
) TO PRESENTENCE REPORT
)

NOW COMES the Defendant, Bhagavan Mahamayavi "Doc" Antle, by and through undersigned counsel, who moves this Court for an extension of time to respond to the Presentence Report (PSR) the United States Probation Office has prepared in his case. In support of the Motion, he would show:

- The current deadline to respond to the PSR is Friday, January 26, 2024;
- The guidelines calculations as contained within the PSR implicate some of the more complex elements of the U.S. Sentencing Guidelines, including grouping rules;
- The Defendant and defense counsel are located in different parts of South Carolina, which has made it more challenging to engage in meaningful reviews of the PSR; and
- The Government consents to this Motion.

Therefore, the Defendant requests a two-week extension to respond to the PSR. Should the Court grant the Motion, the new deadline to respond to the PSR would be Friday, February 9, 2024.

Respectfully submitted,

s/ Andrew B. Moorman, Sr.
Attorney for Defendant
Moorman Law Firm, LLC
416 East North Street
2nd Floor
Greenville, South Carolina 29601
864-775-5800
andy@andymoormanlaw.com
Federal ID # 10013

Respectfully submitted,

s/Ryan Beasley
Attorney for Defendant
Ryan Beasley, P.A.
416 East North Street
2nd Floor
Greenville, South Carolina 29601
864-679-7777
rlb@ryanbeasleylaw.com
Federal ID # 9162

Greenville, South Carolina.